


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 09–129</p> <p align="center">Published on the 27 October 2009 and officially closed for comments on the 24 November 2009</p>

Commenter 1 : Scandinavian Technical Services – Tommy Strand – 10/11/2009

Comment # 1

Would it be an idea maybe to divide AD into 2 separate AD'S, as it is A330 and A340 that is affected.

EASA response:

Not agreed.

The EASA preference is to address individual unsafe conditions with individual ADs where possible. We believe that in general this will contribute to our consistency and also to the clarity of the communication. In this case there is synergy between the situations for the two engine types which feature an almost identical FOHE and between the two aircraft types which have similar fuel systems. The FOHE replacement programme is also common for these two combinations. EASA have therefore judged that a single AD is the preferable option.

Commenter 2: Lufthansa Technik – Peter Bruder – 28/10/2009

Comment # 2

As I am responsible for Trent 500 engine and in substitution of Trent700 (resp. engineer Mr. Mathew) engine I would like to provide Lufthansa comment to you as follows:

Preparing the engineering orders for the maintenance my colleague and myself were sitting down with Rolls-Royce to find a way how this roll over program can be done at Lufthansa.

With the current advance exchange supply of FOHE proposed from RR side LH will be faced a huge burden to ensure the proposed compliance time of 6000Fh starting by 10.07.2009 for both A/C types.

Therefore we asking EASA to reset the compliance time to be 6000Fh from the effective date of RR SBE release (Trent700: 29.09.2009 and Trent500: 23.10.2009) or even better "before 01.01.2011".

EASA response:

Not agreed.

EASA believe that the threat to Airbus aircraft is similar to that to Boeing aircraft which are fitted with the affected standard of FOHE, it is therefore considered appropriate that a similar risk exposure is permitted. The RR recovery programme which provides an improved standard of FOHE is also common across the three aircraft and must manage a limited supply of replacement FOHEs, the equivalent compliance time has the additional benefit of allowing this programme to address highest risk aircraft first, without bias (under the oversight of EASA).

Commenter 3: Cathay Pacific Airways – Alexis Yiu – 30/10/2009**Comment # 3**

Please clarify the compliance time of this AD as it is different from that as stated in Rolls-Royce SB79-AG338.

PAD 09-129: Within 6,000 flight hours from 10 July 2009 or before 01 January 2011 whichever occurs first; but RR SB79-AG338: Within 6,000 flight hours after receipt of Service Bulletin (29 September 2009) or before 1st January 2011 whichever is the sooner.

EASA response:

Not agreed.

Please see the response to comment #2 above.

Commenter 4: Scandinavian Technical Services – Tommy Strand – 10/11/2009**Comment # 4**

Why has EASA/RR selected to also include a flight hour demand in the compliance of REF AD, an accomplishment date should be sufficient.

EASA response:

It is common practice to quote both a usage limitation and a calendar limitation. EASA believes that risk exposure is directly related to usage rate and that it is appropriate to limit the risk of high usage rate aircraft in this way. Please also see the response to comment #2 above.